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United States Attorney

District of Oregon

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:24-cv-01640-MO**

**Plaintiff,**

**COMPLAINT IN REM**  
**FOR FORFEITURE**

**v.**

**REAL PROPERTY LOCATED AT  
4506 SE ANDEREGG LOOP,  
PORTLAND, COUNTY OF  
MULTNOMAH, STATE AND  
DISTRICT OF OREGON, WITH  
BUILDINGS, APPURTENANCES,  
AND IMPROVEMENTS, *in rem*,**

**Defendant.**

Plaintiff, United States of America, for its Amended Complaint *in rem* for forfeiture,  
alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, consists of the following piece of real property, commonly known as 4506 SE Anderegg Loop, Portland, Oregon (hereinafter “Defendant Real Property”) and more particularly described as:

Lot 26, POWELL BUTTE HEIGHTS, in the City of Portland, County of Multnomah and State of Oregon.

DEFENDANT REAL PROPERTY is now and during the pendency of this action will be within the jurisdiction of this Court. DEFENDANT REAL PROPERTY is located in the state of Oregon, Multnomah County.

III.

DEFENDANT REAL PROPERTY, as described above, is property constituting or derived from proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1343, wire fraud, and is property involved in or traceable to property involved in a violation of 18 U.S.C. § 1957, laundering of monetary instruments. The Defendant, *in rem*, is therefore subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C), as more particularly set forth in the Declaration of Rachel Royston, Financial Investigator, marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, Plaintiff, United States of America, prays that due process issue to enforce the forfeiture of DEFENDANT REAL PROPERTY, *in rem*; that due notice be given to all interested persons to appear and show cause why forfeiture of this defendant, *in rem*, should not

be decreed; that due proceedings be had thereon; that this defendant be forfeited to the United States; that the Plaintiff United States of America be awarded its costs and disbursements incurred in this action.

DATED: September 27, 2024.

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

/s/ Katie de Villiers  
KATHERINE C. DE VILLIERS  
Assistant United States Attorney

### VERIFICATION

I, RACHEL ROYSTON declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Certified Financial Investigator employed by the U.S. Attorney's Office in the District of Oregon, and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.

/s/ Rachel Royston

RACHEL ROYSTON, CFE, CAMS

United States Attorney's Office

District of Oregon